

**THE ROSEN LAW FIRM, P.A.**  
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*[Proposed] Lead Counsel for Lead Plaintiff and Class*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

BRAM VAN BOXTEL, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

TENET FINTECH GROUP INC. F/K/A  
PEAK FINTECH GROUP INC., JOHNSON  
JOSEPH, and JEAN LANDREVILLE,

Defendants.

CASE No.: 1:21-cv-06461-PKC-RLM

**NOTICE OF MOTION OF  
ALEJANDRO HANDAL TO: (1)  
APPOINT LEAD PLAINTIFF; AND (2)  
APPROVE LEAD PLAINTIFF'S  
SELECTION OF COUNSEL**

**CLASS ACTION**

**PLEASE TAKE NOTICE** that pursuant to Section 21D of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), Alejandro Handal (“Movant”) hereby moves this Court, the Honorable Pamela K. Chen, United States District Court Judge, on a date and at a time to be designated by the Court, for an order:

(a) appointing Movant to serve as Lead Plaintiff in this action; and

(b) approving Movant's selection of The Rosen Law Firm, P.A. as Lead Counsel for the Class.

In support of this Motion, Movant submits: (i) the Memorandum of Law dated January 18, 2022 (and exhibits); and (ii) a [Proposed] Order Appointing Lead Plaintiff and Approving Lead Plaintiff's Selection of Counsel.

Dated: January 18, 2022

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Phillip Kim  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 18, 2022, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Phillip Kim